

Gregory W. Gilliam
VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas
25th Floor
New York, New York 10020
Tel: (212) 307-5500
Attorneys for Defendants Pusser's Inc., Pusser's Ltd.,
Pusser's West Indies Ltd., and Charles S. Tobias

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAGWITCH L.L.C.,

Plaintiff,

v.

PUSSEY'S INC, PUSSEY'S LTD.,
PUSSEY'S WEST INDIES LTD., and
CHARLES TOBIAS

Defendants.

Case No. 08cv2144 (LTS)

**MOTION FOR *PRO HAC VICE*
ADMISSION OF JASON C. ROSE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts

for the Southern and Eastern District of New York, I, Gregory W. Gilliam, a member in good standing of the bar of this Court, hereby move for an order allowing the admission *pro hac vice* of:

Applicant's Name: Jason C. Rose
Firm Name: Venable LLP
Address: 750 East Pratt Street, Suite 900
City/State/Zip: Baltimore, Maryland, 21202
Phone Number: 410-244-7553
Fax Number: 410-244-7742

Mr. Rose seeks to appear as counsel on behalf of the defendants Pusser's Inc, Pusser's LTD., Pusser's West Indies LTD., and Charles Tobias in this action and in all related matters.

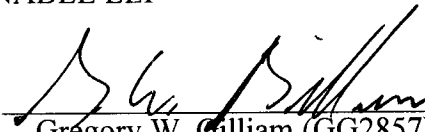
Mr. Rose is and has been a member in good standing of the Bar of the States of Maryland and New York and has no pending disciplinary proceedings against him in any state or federal court.

Dated: New York, New York
June 5, 2007

Respectfully submitted,

VENABLE LLP

By:


Gregory W. Gilliam (GG2857)

Rockefeller Center
1270 Avenue of the Americas, 25th Floor
New York, New York 10020
Tele.: (212) 307-5500
Fax: (212) 307-5598

*Counsel for Pusser's Inc, Pusser's LTD., Pusser's
West Indies LTD., and Charles Tobias*

Gregory W. Gilliam
VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas
25th Floor
New York, New York 10020
Tel: (212) 307-5500
Attorneys for Defendants Pusser's Inc., Pusser's Ltd.,
Pusser's West Indies Ltd., and Charles S. Tobias

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X		
MAGWITCH L.L.C.,	:	Case No. 08cv2144 (LTS)
Plaintiff,	:	
	:	
v.	:	
	:	
PUSSEY'S INC, PUSSEY'S LTD.,	:	
PUSSEY'S WEST INDIES LTD., and	:	
CHARLES TOBIAS	:	
Defendants.	:	
----- X		

**DECLARATION OF GREGORY W. GILLIAM IN SUPPORT OF MOTION
TO ADMIT JASON C. ROSE TO PRACTICE *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, Gregory W. Gilliam, declares as follows:

1. I am an attorney admitted to practice before this Court and am an associate at Venable LLP, counsel for Pusser's Inc, Pusser's LTD., Pusser's West Indies LTD., and Charles Tobias. I am familiar with the proceedings of this case. I make this declaration in support of Defendants' motion to admit Jason C. Rose *pro hac vice* as counsel to represent Defendants in this action and in all related matters.

2. I am a member of good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Rose is an associate in the Baltimore, Maryland office of Venable LLP, 750 East Pratt Street, Suite 900, Baltimore, Maryland 21202. Upon information and belief, Mr. Rose is and has been a member in good standing of the bar of the Maryland and the bar of New York and has no pending disciplinary proceedings against him in any state or federal court.

4. Mr. Rose has read and is familiar with (a) the provisions of the Judicial Code (Title 28 U.S.C.), which pertains to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Evidence; (d) the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York; (e) the New York State Lawyer's Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York; and (f) the code of Professional Responsibility of the American Bar Association.

5. If admitted to practice before this Court, Mr. Rose will faithfully adhere to all rules applicable to his conduct in connection with his activities representing Defendants in this matter.

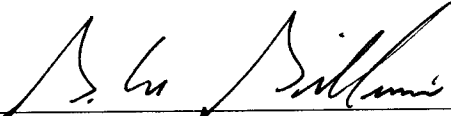
6. Mr. Rose agrees to pay the fee of \$25.00 upon filing of this motion to practice *pro hac vice* in this action. Mr. Rose's telephone number is (410) 244-7400.

7. Mr. Rose's Certificates of Good Standing from the Clerk of the Court of Appeals of Maryland and from the Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department is attached hereto as Exhibit A.

8. I respectfully submit a proposed order granting the admission *pro hac vice* of Jason C. Rose as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
June 5, 2007

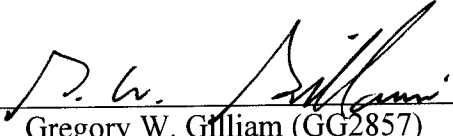


Gregory W. Gilliam (GG2857)

CERTIFICATE OF SERVICE

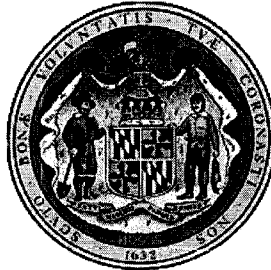
I HEREBY CERTIFY that on June 5, 2008 I caused the foregoing Notice of Motion for the *Pro Hac Vice* Admission of Jason C. Rose and the accompanying declaration to be sent by first-class mail to the following:

Andrew W. Heymann, Esq.
SOLOMON PEARL BLUM HEYMAN & STITCH LLP
40 Wall Street, 35th Floor
New York, New York 10004
Attorneys for Plaintiff Magwitch L.L.C.



Gregory W. Gilliam (GG2857)

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the seventeenth day of December, 1998,*

Jason Charles Rose

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-seventh day of May, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

**Appellate Division of the Supreme Court
of the State of New York
First Judicial Department**

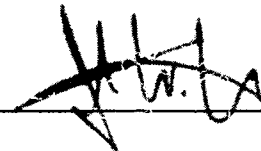
I, John M. McConnell, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

JASON CHARLES ROSE

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on the 19th day of April, 2004 has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

May 30, 2008



Clerk of the Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----		X
MAGWITCH L.L.C.,		:
	Plaintiff,	:
		:
v.		:
		:
PUSSEY'S INC, PUSSEY'S LTD.,		:
PUSSEY'S WEST INDIES LTD., and		:
CHARLES TOBIAS		:
	Defendants.	:
-----		X

Case No. 08cv2144 (LTS)

**ORDER GRANTING MOTION FOR
PRO HAC VICE ADMISSION OF JASON C. ROSE**

This matter having come before the Court on the motion for an order permitting Jason C. Rose, a partner at Venable LLP, to practice *pro hac vice* before the United States District Court for the Southern District of New York (the "Motion") to represent Pusser's Inc, Pusser's LTD., Pusser's West Indies LTD., and Charles Tobias in this action and in all related matters:

IT IS HEREBY ORDERED that the Motion is hereby granted, and Jason C. Rose is hereby admitted *pro hac vice* before this Court to represent Pusser's Inc, Pusser's LTD., Pusser's West Indies LTD., and Charles Tobias in this action and in all related matters.

Dated: New York, New York
June____, 2008

LAURA T. SWAIN, U.S.D.J.